

ADVANCED EMERGENCY COMMUNICATIONS COALITION



**DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
and the
DEPARTMENT OF AGRICULTURE
Rural Utilities Service**

***Comments Regarding*
Docket No. 090309298–9299–01
American Recovery and Reinvestment
Act of 2009 Broadband Initiatives
April 13, 2009**

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**PUBLIC SAFETY BROADBAND NEEDS
UNDER
THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009**

Background

America's public safety communications infrastructure needs to keep up with the rapidly changing communications environment. Unfortunately, much of public safety has narrowband lineal communications technologies in a networked broadband world. The Next Generation 9-1-1 program envisions a fully transformed emergency communications environment which can send and receive voice, video and data to and from multiple devices using robust applications. An essential building block of the NextGen 9-1-1 is mobile, fixed and nomadic broadband access to PSAPs, first responders and emergency medical professionals.

The broadband needs of the public safety community are not only substantial but also very diverse. While the general population has access to a wide variety of broadband-driven means of communicating through voice, data, and video applications, essential public safety communications remains largely limited to voice only applications. Broadband connectivity is an essential step that is required for public safety communications to move into next generation services. This is true for the full spectrum of emergency communications from public safety answering points (PSAPs) to first responders to medical, transportation, and homeland security entities that provide the backbone of emergency response and public safety.

The public safety and emergency response community needs both mobile and fixed broadband connectivity. Funding made available under the American Recovery and Reinvestment Act of 2009 (ARRA) can, if structured appropriately, provide some significant support to help advance emergency communications needs. The ARRA provides an important opportunity to give public safety entities access to broadband capacity and technologies and to encourage public safety to more broadly adopt and use broadband technologies to protect the public, prevent danger and respond to individual and mass emergencies. Broadband service is essential for emergency communications and to maximize safety and value for the public and for emergency responders and healthcare providers (i.e., for 9-1-1 centers to receive and be able to share GIS and caller location data, emergency alerts and alarms, text messaging, and video relay services for the accessibility of deaf and hard-of-hearing people to emergency services, and other potentially lifesaving information). Further, implementation of Next Generation 9-1-1 is dependent upon wide-spread broadband connectivity to Public Safety Answering Points (PSAPs) and other first responder entities such as fire houses, police stations, and other entities involved in emergency response.

Broadband presents two benefits to public safety in underserved areas that have significant benefits to assure continuity of service, particularly when the need for public safety service is the greatest such as during disaster situations. Broadband is flexible to permit rapid capacity expansion and broadband presents opportunities for network diversity. The former is critical to the effective utilization of resources arriving to assist. Broadband diversity helps to assure service when transport routes are disrupted both as physical diversity and by the inherent nature to support high capacity packet networks.

The Advanced Emergency Communications Coalition (AEC Coalition) is made of non-profit organizations, including many public safety and health care related entities, and industry that provide technology solutions that enhance emergency response.

Comments

National Telecommunications and Information Administration (NTIA). Section 6001(b) of the ARRA establishes several purposes for the Broadband Technology Opportunity Program (BTOP) grant program, including providing access broadband deployment in unserved areas and enhances broadband service in underserved areas. In addition, Section 6001(b)(4) specifies that ARRA funds are available to improve access to, and use of, broadband service for public safety.

In establishing the eligibility and evaluation criteria for the BTOP program, applicants should be encouraged to submit innovative solutions that address the broadest possible set of criteria specified in the statute, including public safety needs. Further, proposals that effectively demonstrate that they will foster greater use of broadband by 9-1-1 and emergency response organizations should be viewed as a positive selective criterion. NTIA should allow for any entity to qualify for ARRA public safety funding under Section 6001(b)(4). Not only should state, local and Tribal governments be able to apply directly, but private and public-private partnerships should be encouraged under the BTOP program to apply for funding to address public safety needs. All applicants for BTOP funding should also be encouraged to include public safety needs in their BTOP grant applications. Applicants who address public safety needs should benefit by receiving scoring points for such an effort.

The NTIA, RUS and the FCC should not limit the concept of unserved and underserved to geographic or residential parameters. Not only are their geographic areas that are unserved or underserved, there are communities of interest which are unserved or underserved. A community for example could have outstanding residential broadband access, but PSAPs, police stations and firehouses may lack broadband connectivity.

The availability and adoption of broadband services – fixed landline as well as mobile and nomadic wireless broadband – for public safety must be considered in determining the definitions of “unserved areas” and “underserved areas.” The definitions of “unserved” and “underserved” should include consideration of demonstrated unmet

needs by one of the constituencies related to Section 6001(b)(3), (4), and (5) priorities. For example, an unserved area should not only be a particular area that does not have access to the minimal transmission speeds established by NTIA for the purposes of BTOP grants, but it should also include the unmet needs of the public safety community. Thus, an application seeking to provide new, *previously not available* broadband service to public safety in an area should be considered unserved or underserved.

Applications seeking to serve institutions with bandwidth, hardware, software or specialized applications should be eligible as improving access to those institutions under Section 6001(b)(3), (4) and (5) regardless of whether residents and businesses in a community are unserved, underserved, or served. The statutory authority is independent of sections (b)(1) and (2).

When the agency considers competitive applications broadband infrastructure, those that address public safety needs should receive bonus scoring points. This will encourage applications that coordinate for programs that improve public safety and emergency communications. Applicants seeking solely to upgrade public safety's access to broadband should also be considered eligible and should be encouraged regardless of the level of broadband service available to residential consumers. In addition, deference to states, municipalities, and tribal governments that identify public safety related projects or support public safety related applications should be provided.

In addition to eligibility to construct and deploy facilities that improve public safety broadband communications services, educational efforts specifically targeted at encouraging public safety to adopt and expand its use of existing and new broadband networks should be a clear eligible purpose of the NTIA demand stimulation program. These efforts can help public safety, health care, public and private emergency responders to identify, use and develop tools that can harness the power of expanded bandwidth to share data in real time, to provide life saving medical information to first responders and emergency rooms, to identify the location of life saving assets such as nearby defibrillators, extraction devices and places of shelter and provide a networked sharing of useful real time traffic and hazard information to traffic managers, drivers, dispatchers, and the public to help each speed response and avert danger and to help first responders utilize, understand and analyze the growing area of sensor technologies and machine to machine and machine to infrastructure communications.

Rural Utilities Service (RUS). Section 6107 of P.L. 110-246 authorizes loans for facilities and equipment in rural areas for 9-1-1 access; integrated, interoperable emergency communications, including multiuse networks that provide commercial and transportation information services in addition to emergency communications services; homeland security communications; transportation safety communications; or location technologies used outside of an urbanized area. The RUS should utilize some of the ARRA funds for this financing authority and should establish flexible rules for the program, encouraging creative and innovative solutions to address emergency communications needs in rural areas. Financing under this program should be available

at the same time the agency makes funds available under other programs funded by the ARRA.

Effectiveness and Simplification. Both NTIA and the RUS should also look to every opportunity to simplify and expedite the application and evaluation process.

ADVANCED EMERGENCY COMMUNICATIONS COALITION



MISSION: To advocate for the adoption and improvement of advanced emergency communications technologies.

MEMBERSHIP (as of April 13, 2009):

- 9-1-1 Magazine
- Atrus, Inc. / AED Link
- ATX / Cross Country Automotive Services
- Buffalo Computer Graphics
- Care for Crash Victims
- Emergent Communications
- ESRI
- INdigital Telecom
- International Association of EMS Chiefs
- International City/County Managers Association
- Language Line Services
- National Association of State 9-1-1 Administrators
- National Association of State Fire Marshals
- National Institute for Urban Search and Rescue
- National Partnership for Careers in Law, Public Safety, Corrections and Security
- OnStar
- Pictometry
- Roadside Telematics Corporation
- Sudden Cardiac Arrest Foundation
- TeleCommunication Systems

- Telecommunications for the Deaf and Hard of Hearing
- Urban & Regional Information Systems Association
- Wireless Car